# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff.

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NOMURA INTERNATIONAL PLC.

Defendant.

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05348 (SMB)

## STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Nomura International plc ("Defendant") may answer, move against, or otherwise respond to the Trustee's amended complaint ("Amended Complaint") is extended up to and including August 29, 2014. The pre-trial conference will be adjourned from August 27, 2014, at 10:00 a.m. to October 22, 2014, at 10:00 a.m.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for the Defendant to answer, move against, or otherwise respond to the Amended Complaint.

Nothing in this Stipulation is a waiver of the Defendant's right to request from the Court a

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further extension of time to answer, move against, or otherwise respond to the Amended Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all other rights, arguments, objections, and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses, including, without limitation, challenges to personal jurisdiction or to the jurisdiction of this Court.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: June 25, 2014

New York, New York

## /s/ Thomas L. Long

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### /s/ <u>Christopher R. Fenton</u>

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